

UNITED STATES FEDERAL DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

FILED  
U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA

2015 SEP 14 P 5:03

Oprah Ingram

V.

Case number:

CLERK J. Burton  
S.D. DIST. OF GA.

Regal Cinema Theater et al. *See pg 2*

CV 115-146

I, Oprah Ingram, petitioner herein being an adult and competent to testify and having first hand knowledge of the facts set forth herein affirm that says facts are true and correct and to the best of my knowledge belief and understanding hereby file this title 42 Section

1983 action pursuant to the 1st, 4th, 5th, and section 1 and 5 of the 14th amendments to the Constitution of the United States of America and state to the record the facts as follows

**Statement of the case**

1. This is a title 42 United States Code section 1983 action before for redress of injury sustained in the state of Georgia as a direct and proximate results of the acts of certain named and an unnamed employees of Regal Cinema Theaters acting under the color of state law by and threw corporate policy and procedures violating the petitioner's constitutionally protected right to be secure in her person and effects from unreasonable warrantless search and seizure without probable cause or provocation.

**Jurisdiction**

2. This action is being brought pursuant to the 1st amendment to the Constitution of the United States for deprivation of Rights denied by certain named an unnamed defendant employees acting under color of state law without a cause in fact while committing acts under policies customs and practices as enforced by Regal Cinema Theaters by and threw its employees

3. That this court has jurisdiction of the subject matter of the warrantless search and seizure of the petitioners person and property pursuant to article 6 clause 2 and the 1st 4th 5th 9th 10 13th and section 1 of the 14th amendment to the constitution for the United States of America

4. This court has jurisdiction over the parties and that demand and unnamed defendant parties participated in the unconstitutional ask that deprived the rights of the petitioner by enforcing the policies as practiced by Regal Cinema Theatre's for alleged security purposes and within the jurisdiction of this United States District Court.

5. That this action involves a federal question under Title 28 US Code section 1331 for violation of the petitioners rights in the 4th 5th and section 1 of the Fourteenth Amendment of the United States Constitution of which gives rise to the title 42 US Code section 1983 action against the

name in the Name defendants within the jurisdiction of this court for redress of injuries to the petitioner .

6. That the violations of petitioners rights occurred within the venue of this court and all defendants are being sued in their individual and official capacities.

## **II. Parties**

7. Petitioner #1 Oprah Ingram  
3704 Elmwood Court  
Hephzibah, GA 30813
8. Defendant #1 Amy E. Miles  
CEO Regal Cinema Theatres  
7132 Regal Lane  
Knoxville, TN 37918
9. Defendant # 2 Ron Rippo  
General Manager  
1144 Aggerton Lane  
Augusta, GA 30909
10. Defendant #3 Unknown Female Attendant Jane Doe  
1144 Aggerton Lane  
Augusta, GA 30909
11. Defendant #4 Noah Barkson  
General Manager  
261 19th St NW #1250  
Ste 1250  
Atlanta, GA 30815
12. Defendant #5 Tieanna  
261 19th St NW #1250  
Ste 1250  
Atlanta, GA 30815

## **III. FACTS.**

13. That petitioner reasserts above numbers 1 through 12 as factual.

14. That on 8/25/2015 petitioner and her husband Brandon Ingram visited the Regal Cinemas Augusta Exchange Stadium 20 & Imax.

15. That after purchasing tickets and entering the theater petitioner and her husband were informed by defendant unknown theater attendant Jane Doe and informed that the petitioners purse needed to be searched for security purposes.

16. That unknown theater attendant Jane Doe stated that the manager had placed her there to check all bags .

17. That petitioners only saw food and candy being confiscated during the alleged security search.

18. That on 09/02/2015 petitioner and her husband Brandon Ingram visited the Regal Cinemas Atlantic Station 18 IMAX and RPT

15. That after purchasing tickets and entering the theater petitioner and her husband were informed by defendant known theater attendant "Tieanna" and informed that the petitioners purse needed to be searched for security purposes.

16. That known theater attendant "Tieanna stated that the manager had placed her there to check all bags .

17. That petitioners only saw food and candy being confiscated during the alleged security search.

18. That at neither theater locations was the personal items of men subjected to search

19. That neither theaters had signs or notice of search placed conspicuously placed to allow petitioner to reserve her right to privacy.

#### IV. CAUSES OF ACTION

20. That petitioner reaffirms 1 through 20 above and hereby states the cause of action as follows:

a.) That the actions of theater attendant Jane Doe as directed by general manager Ron Rippo as implemented Amy E. Miles were violative constitutionally protected rights to be free from unreasonable search and seizure in that the ruse of a safety concern was used to gain consent to a search for items not of a threatening nature and especially aimed at profiling women by searching their purses and bags.

b.) That the actions of theater attendant " Tieanna" as directed by general manager Noah Barkson as implemented Amy E. Miles were violative constitutionally protected rights to be free from unreasonable search and seizure in that the ruse of a safety concern was used to gain consent to a search for items not of a threatening nature and especially aimed at profiling women by searching their purses and bags.

**V. DEMAND FOR RELIEF**


a.) That the petitioner seeks the sum of \$1.2 million For the violations of right occurring in above cause of action a.

b.) That the petitioner seeks the sum of \$1.2 million For the violations of right occurring in above cause of action b.

c.) That further punitive and compensatory damages be left up to the jury to decide in order to compensate petitioner for mental anguish and to deter future acts from being repeated

Trial by Jury hereby demanded.  
Further the affiant sayeth naught.

Executed this 14 day of 09 2015.

  
\_\_\_\_\_  
Oprah Ingram  
3704 Elmwood Street  
Hephzibah, GA 30815

Before me, a Notary Public for the State of Georgia, personally appeared Oprah Ingram who is personally known by me, or ( ) have proved by satisfactory evidence, !to be the affiants in the foregoing instrument and have sworn to and subscribed in my presence, the foregoing document, on this \_\_\_\_\_ day of \_\_\_\_\_, in the year of our Lord Two Thousand Fifteen.

\_\_\_\_\_  
my commission expires (seal)

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